

EXHIBIT B

STATE OF KENTUCKY)
COUNTY OF JEFFERSON)

AFFIDAVIT

PERSONALLY appeared before me Tonya Hamby, who, after being duly sworn, certifies and declares as follows:

1. I am a Registered Nurse.
2. I worked in the Palmetto Health Richland Hospital Operating Room (OR) primarily on orthopaedic cases during the time Dr. Irani was at Palmetto Health Richland.
3. I often worked closely with Dr. Afraaz Irani and the orthopaedic staff.
4. During his time at Palmetto Health I grew to appreciate working with Dr. Irani.
5. I observed that Dr. Irani was among the most well-liked of the orthopaedic residents and faculty among the OR support staff.
6. Dr. Irani got along with all the ancillary staff I observed him interacting with.
7. He was always professional, quick with a smile, and his sense of humor was appreciated by the nurses and techs that worked with him.
8. Dr. Irani was from California, and the system at Palmetto Health was very hierachial.
9. I observed that Dr. Irani was always polite and acted in a similar manner to other residents.
10. I observed Dr. Irani always answering his superiors by saying "yes sir" and "no sir."
11. The orthopaedic attendings seemed to emphasize faults with Dr. Irani more than his colleagues.
12. I heard Dr. Irani referred to as a terrorist by Dr. Koon.
13. The idea that people must be put in their place was a common mindset at the hospital.
14. I observed Dr. Irani to be very enthusiastic about orthopaedics and always wanted to help out.
15. He often stayed to help nursing/operating room staff with the patients.
16. I never heard a complaint about him from the OR support staff.
17. From my observations, the OR ancillary staff all enjoyed Dr. Irani's company.
18. Although residents are physicians, they are often new to the practice of medicine.
19. Accordingly, it is often beneficial and important for the new resident to show deference to their superiors as well as experienced operating room staff.
20. Dr. Irani always did this and showed no pretense or ego when he joined the orthopaedic team.

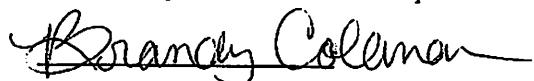
21. He always asked myself and other nurses and techs if there was anything else he could do to help out and asked us if we had any suggestions for improvement regarding the case.
22. This open flow of dialogue allowed easy communication between Dr. Irani and ancillary staff.
23. I observed him to show great empathy and concern for the patients under his care.
24. I observed him to be cooperative, helpful, and an excellent team player with his fellow residents and staff.

I declare under penalty of perjury that the foregoing is true and correct.


Tonya Hamby/RN

State of Kentucky County of Jefferson

Subscribed and sworn to (or affirmed) before me on this 10 day of July, 2014
by Tonya Hamby, personally known to me or proved to me on the basis of
satisfactory evidence to be the person who appeared before me



Signature of Notary Public

Notary Public for Jefferson County, KY

My commission expires: Nov. 30, 2015